



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

MEL  
F. #2014R00003

*271 Cadman Plaza East  
Brooklyn, New York 11201*

February 13, 2018

BY HAND DELIVERY AND ECF

The Honorable Allyne R. Ross  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

The Honorable Nicholas G. Garaufis  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: United States v. Khosrow Hakimian  
Criminal Docket No. 18-71 (ARR)

Dear Judge Ross and Judge Garaufis:

Pursuant to Local Rule 50.3.2, the government hereby notifies the Court that the above-captioned case ("Khosrow Hakimian") is presumptively related to United States v. Parviz Hakimian, No. 18-CR-70 (NGG) ("Parviz Hakimian").

Local Rule 50.3.2(b)(1) provides for a "presumption that one case is 'related' to another when the facts of each arise out of the same charged criminal scheme(s), transaction(s), or event(s), even if different defendants are involved in each case." Local Rule 50.3.2(c)(1) directs the United States Attorney's Office to "give notice to all relevant judges whenever it appears that one case may be presumptively related to another pursuant to Section (b)(1)."

This letter constitutes the notice directed by Local Rule 50.3.2(c)(1). This case is presumptively related to Parviz Hakimian because the facts of Khosrow Hakimian's case arise out of the same criminal transactions and events as charged in Parviz Hakimian. Specifically, Parviz and Khosrow Hakimian are brothers who both held undisclosed foreign bank accounts in Israel. During the relevant years, the accounts were held separately and

